

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

ZAPFRAUD, INC.,	)	
	)	
Plaintiff,	)	
	)	
v.	)	C.A. No. 19-1691-CFC
	)	
PROOFPOINT, INC.,	)	
	)	
Defendant.	)	

**PROOFPOINT, INC.'S MOTION TO TRANSFER VENUE**

Defendant Proofpoint, Inc. (“Proofpoint”) hereby moves to transfer this litigation to the Northern District of California pursuant to 28 U.S.C. § 1404(a). In support of this motion, Proofpoint submits its opening brief and the declarations of John Dials and Michael R. Rueckheim.

Pursuant to Local Rule 7.1.1, Proofpoint certifies that the parties made reasonable efforts to reach agreement on the matters set forth in this motion, and Plaintiff ZapFraud, Inc. has stated it will oppose the motion.

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